Case 17-11663 Doc 49 Filed 04/15/19 Entered 04/15/19 13:52:17 Desc Main Document Page 1 of 5

United States Bankruptcy Court Northern District of Illinois Eastern Division

In Re:	Ivory Dugas)	
)	Chapter 13
	Debtor)	Judge Barnes
)	Case # 17-11663

To:

By Mail, See Attached Service List
By Electronic Notice, Trustee Marilyn Marshall, courtdocs@chi13.com
US Trustee Patrick S Layng, USTPRegion11.es.ecf@usdoj.gov

NOTICE OF MOTION

Please take notice that on **April 18, 2019 at 9:30 a.m.** I shall bring the above motion for hearing before Judge Barnes, or whomever is sitting in Judge Barnes' stead, at 219 S Dearborn, Courtroom 744, Chicago, IL 60604.

Certification

I certify that the motion and notice of motion were served by mail to the parties listed on the attached service list by depositing copies in envelopes addressed to each party with proper postage in the United States mail on April 15, 2019 and by electronic notice through ECF at the above email addresses on April 15, 2019.

/s/ David Gallagher #6295024

Attorney for Debtor Gleason and Gleason 77 W Washington, Suite 1218 Chicago, IL 60602 Ph: (312) 578-9530

Fax: (312) 578-9524

Label Matrix for local noticing 0752-1 Case 17-11663 Northern District of Illinois Eastern Division Mon Apr 15 13:43:48 CDT 2019

Chase Auto 201 N Central Ave Phoenix, AZ 85004-1071

City of Chicago Corporation Counsel Attn: Stephen Patton 30 N LaSalle St, Room 700 Chicago, IL 60602-2503

Enhanced Recovery Corp 8014 Bayberry Rd Jacksonville, FL 32256-7412

Il Dept Of Healthcare 509 S 6th St Springfield, IL 62701-1809

Mb Financial Services PO Box 961 Roanoke, TX 76262-0961

(p) PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067

(p) T MOBILE C O AMERICAN INFOSOURCE LP 4515 N SANTA FE AVE OKLAHOMA CITY OK 73118-7901

Ivory Dugas 2439 E. 74th St Unit 3E Chicago, IL 60649-3403

Patrick S Layng Office of the U.S. Trustee, Region 11 219 S Dearborn St. Room 873 Chicago, IL 60604-2027

Doc 49 Filed 04/15/19 Eastern Division Ti 219 S Dearborn 7th Floor

Chicago, IL 60604-1702 City of Chicago

121 N LaSalle, #507 Chicago, IL 60602-1208

Attn: Mayor Rahm Emanuel

City of Chicago Department of Finance c/o Arnold Scott Harris P.C. 111 W. Jackson Ste. 600 Chicago, IL 60604-3517

Page 2 of 5

Fed Loan Serv Po Box 60610 Harrisburg, PA 17106-0610

Illinois Department of Healthcare & Family S Attn: DCSS CSAT - Bankruptcy Unit PO Box 19405 Springfield, IL 62794-9405

Nationwide CAC 3435 Cicero Chicago, IL 60641-3719

Premier Bankcard, LLC Jefferson Capital Systems, LLC Assignee PO Box 7999 Saint Cloud MN 56302-7999

U.S. Department of Education c/o FedLoan Servicing P.O. Box 69184 Harrisburg, PA 17106-9184

Julie M Gleason Gleason & Gleason LLC 77 W Washington Suite 1218 Chicago, IL 60602-3246

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> City of Chicago - Dept of Finance Administrative Hearings 121 N LaSalle St 107A Chicago, IL 60602-1232

City of Chicago Dept of Law Attn: Charles King 121 North LaSalle Street, Suite 600 Chicago, IL 60602-1244

First Premier Bank 601 S Minnesota Ave Sioux Falls, SD 57104-4868

Illinois Dept of Employment Securit Bankruptcy Unit Collection Subdivis 33 S State St 10th Floor Chicago, IL 60603-2804

Portfolio Recovery Ass 120 Corporate Blvd Ste 1 Norfolk, VA 23502-4952

Secretary of State Attn: Safety & Financial Resp 2701 S Dirksen Pkwy Springfield, IL 62723-0002

David Gallagher Gleason and Gleason 77 W Washington St 1218 Chicago, IL 60602-3246

Marilyn O Marshall 224 South Michigan Ste 800 Chicago, IL 60604-2503

Case 17-11663 Doc 49 Filed 04/15/19 Entered 04/15/19 13:52:17 Desc Main Document Page 3 of 5

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Portfolio Recovery Associates, LLC Successor to CAPITAL ONE BANK (USA), N.A. POB 41067 Norfolk, VA 23541 T-Mobile Bankruptcy Team PO Box 53410 Bellevue, WA 98015 End of Label Matrix
Mailable recipients 27
Bypassed recipients 0
Total 27

United States Bankruptcy Court Northern District of Illinois Eastern Division

In Re:	Ivory Dugas)	
)	Chapter 13
	Debtor)	Judge Barnes
)	Case # 17-11663

MOTION TO VACATE PAYROLL ORDER AND SHORTEN NOTICE

Now comes Counsel for Ivory Dugas David Gallagher of Gleason and Gleason, and respectfully states:

- That Debtor filed the above captioned case under section 13 of the Bankruptcy Code on April 13, 2017.
- 2. That this case was confirmed on August 1, 2017 with payments of \$225.00 a month and the unsecured creditors will get 6% of their timely, allowed and filed claims
- 3. That a payroll order was entered voluntarily on May 3, 2017 as docket #15.
- 4. That Debtor started working at a part-time job he once had when he first filed his bankruptcy in 2017. That employer resumed taking \$51.93 out of his pay check each week, on top of his main employer's deduction of \$112.50, bi-weekly.
- The Debtor seeks to vacate the new payroll deduction from Neeroo LLC, which started on April 12, 2019.
- That Debtor knows 7 days notice is required for this motion, but the debtor is having double
 Trustee payments taken out and the next court date isn't until May 2, 2019.
- 7. Debtor seeks to shorten notice to 3 days.

WHEREFORE, Debtor prays that this Court vacate the payroll order entered only for Neeroo LLC (Docket #15), shorten the notice requirement to 3 days, and any further relief that this court deems necessary.

Respectfully Submitted,

<u>/s/ David Gallagher</u>
One of Attorneys for Debtor

Gleason and Gleason 77 W. Washington, Suite 1218 Chicago, IL 60602 Ph (312) 578-9530 Julie Gleason #6273536 Troy Gleason #6276510 David Gallagher #6295024